

# EXHIBIT 3

**From:** [Joshua J. Metcalf](#)

**Sent:** Tuesday, September 9, 2025 3:49:15 PM

**To:** [Jason Rotstein](#); [Perry Sanders Jr](#); [Andrew K. Glenn](#); [Nathan Ades](#); [David Wallace](#); [Trevor J. Welch](#); [Esther Hong](#)

**Cc:** [Kyle L. Gideon](#); [Daniel Mulholland](#); [Joel Fyke](#); [Taylor D. Waxley](#)

**Subject:** RE: Epperson - 30(b)(6) Deposition

**Sensitivity:** Normal

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Jason,

We believe that it is appropriate to hold the corporate deposition in Memphis, where IP is headquartered and the witness lives. That is standard procedure for corporate depositions across the country and in the 5<sup>th</sup> Circuit.

We will not currently agree to put our corporate witness up for more than one day of 7 hours. However, we suggest that both parties reassess this issue after our witness has testified. If the issue is not moot, and we cannot agree to a resolution , you can file a motion.

We do not agree to an individual deposition of Ms. Lee at this stage of the proceedings because we do not believe that an individual deposition fits within the Court's Phase I limitation to "matters necessary for Plaintiff to fashion a class and file a motion for class certification." Ms. Lee was not employed by IP during the operation of the DeRidder facility and has no personal knowledge to offer regarding production and operation.

**[Joshua J. Metcalf](#)**

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